U.S. Department of Interior Bureau of Land Management Roseburg District, Oregon

Environmental Assessment for the Mt. Scott Resource Area RIGHT VIEW Regeneration Harvest EA No. OR - 104 - 94 - 18

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Preparer: Jim Luse

INTRODUCTION

The Environmental Assessment (EA) is a site specific analysis of potential environmental impacts which could result with implementation of a proposed action or alternatives. This EA has been prepared for the Mt. Scott Resource Area's proposed **RIGHT VIEW Regeneration Harvest**. This proposal is in conformance with the 1983 Management Framework Plan (MFP) as amended by the "Record of Decision (ROD) for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl" dated April 13, 1994 and the Proposed Resources Management Plan (PRMP) dated October 1994. The ROD establishes management direction consisting of ".... extensive standards and guidelines [S&G], including land allocations, that comprise a comprehensive ecosystem management strategy" (ROD pg. 1). The matrix land allocation is one of seven allocations specified by the ROD. "Stands in the matrix can be managed for timber and other commodity production, and to perform an important role in maintaining biodiversity" (B-6 of S&G).

The project described in this EA must support a "Finding of No Significant Impact" (FONSI) before this proposal can be referred for public review. The FONSI shows that no significant environmental impacts (effects) will occur with the implementation of the proposed action when the project design features specified in the EA are followed. Approval of a proposed action would be reflected in a subsequent timber sale Decision Record.

I. PURPOSE OF AND NEED FOR ACTION

A. Need for Action

The selling and processing of timber and other forest commodities are a vital part of supporting the local and regional economies. The forest is a dynamic system that is constantly changing. As natural disturbances such as fire destroy the older forests, newer forests are created in their place. Harvesting of forests lands is an attempt to make good use of a forest resource that might otherwise be lost. The Mt. Scott Resource Area proposes to offer the **RIGHT VIEW Regeneration Harvest** for auction in fiscal year 1995. This proposal is the Resource Area's first major project under the ROD (commonly called the "President's Plan"). The ROD permits "timber harvest and other silvicultural activities in that portion of the matrix with suitable forest lands, according to standards and guidelines" (C-39 of S&G). This proposal would help to provide "a sustainable supply of timber and other forest commodities [to the local economy]' (PRMP pg.ix).

B. <u>Description of the Proposal</u>

The proposal is to harvest timber in the Old Fairview watershed, located in Section 13 and 15, T26S R2W, W.M. (see Appendix A - "Vicinity Map" and Appendix B - "Tract Map). This

proposal is located in lands within the matrix allocation. The PRMP has further broken down the matrix lands into two categories: the General Forest Management Area (GFMA), which is intended for intensive forest management practices; and Connectivity which is designed for providing habitat for late successional species as well as a connection between the late-successional reserves. Section 13 has been classified as GFMA and section 15 as connectivity. This project is approximately eleven road miles east of Glide and 18 air miles northeast of Roseburg, Oregon. Approximately 106 acres will be analyzed for potential activity. New road construction and renovation or improvement of existing roads would also occur. Section II of this EA provides a further description of the proposed action and alternatives.

C. Background (Watershed Analysis)

A requirement of the ROD is that watershed analysis be completed before projects could be implemented (B-20). A first iteration of this analysis was completed for the Old Fairview watershed in July 1994. The overall vegetation type and its effects on stream flows were analyzed with the existing information. There are five compartments (sub-drainages) within the Old fairview watershed. A sub-drainage was generally considered in good condition for stream flow if 70% of the forest stands were older than 30 years of age. Only two sub-drainages, Hogback and Cole Creeks, were well above this percentage at 91% and 92% respectively. The remaining three sub-drainages were either very close or well below this criteria. This analysis helped to guide the Interdisciplinary Team (IDT) in its selection of Hogback and Cole Creek for the proposed regeneration harvest. Any harvesting in these sub-drainages was thought to have the least cumulative impacts on stream flow.

One of the desired future condition objectives of the Old Fairview Watershed is to maintain sufficient amounts of different vegetative age classes as habitat for 33 species of concern. After watershed analysis was completed it was realized that this could be used as a guideline but should not be more restrictive than the ROD itself. Harvest units were selected, as much as possible, with this guideline in mind in order to change vegetative age classes in the overall watershed to a more desirable distribution. Units 13C and D of the proposed action alternative were the only areas that did not exactly follow this guideline.

More detailed information is provided in the Old Fairview Watershed Analysis which is available for public review at the Roseburg District office.

D. Objectives

- 1. Practice ecosystem management as outlined in the ROD.
- 2. Provide for community economic stability.
- 3. Help in meeting District Potential Sale Quantity (PSQ) goals.

E. <u>Decisions to be made or actions to be completed before this project can be implemented</u>

- 1. The Decision Maker, in this case the Mt. Scott Area Manager, will need to decide:
 - if this analysis supports the signing of a FONSI.
 - whether to proceed with the proposed action, adopt certain portions of the proposed action, or accept the no action alternative.
- 2. Conferencing and/or consultation with the US Fish and Wildlife Service (USF&WS) will have to be accomplished in order to determine the level of significance for Threatened and Endangered (T&E) species and affects on Critical Habitat for the northern spotted owl.
- 3. This EA will need to undergo thirty days of public review and a Decision Record signed.

F. <u>Issues considered but eliminated from Detailed Analysis</u>

The following issues were considered by the ID Team during project design. They were either eliminated from further analysis because certain project design features (PDF's) were included as part of the proposed action in order to eliminate the anticipated environmental impacts of specific activities; or the resource value does not exist in the analysis area. Section II, paragraph C provides a list of specific PDF's incorporated into the proposed action to deal with these issues. These issues are also briefly discussed in Appendix D ("Scoping Summary").

- 1. Meeting Aquatic Conservation Strategy objectives in the Riparian Reserves.
- 2. Meeting silvicultural objectives for reforestation and soils objectives for slope stability.
- 3. Meeting cavity dweller requirements
- 4. Special habitat features in the units.
- 5. Maintaining sufficient levels of down woody debris.
- 6. Meeting air quality, fuels and fire management objectives.
- 7. Impacts to special status plants.
- 8. Impacts to cultural sites.
- 9. Visual impacts to the North Umpqua Wild and Scenic River corridor.

"Critical Elements of the Human Environment" is a list of elements specified in BLM Handbook H-1790-1 that must be considered in all EA's. These are elements of the human environment subject to requirements specified in statute, regulation, or executive order. These elements are as follows:

- 1. Air Quality
- 2. Areas of Critical Environmental Concern
- 3. Cultural Resources
- 4. Farm Lands (prime or unique)
- 5. Floodplains
- 6. Native American Religious Concerns
- 7. Threatened or Endangered (T&E) Species
- 8. Wastes, Hazardous or Solid
- 9. Water Quality, Drinking / Ground
- 10. Wetlands / Riparian Zones
- 11. Wild and Scenic Rivers
- 12. Wilderness

These resource values (except for item #7 and #9) were not identified as issues to be analyzed because: (1) there were no site specific impacts identified, (2) the resource value does not exist in the analysis area, or (3) the impacts described in the PRMP were considered to be sufficiently mitigated and eliminated as an issue of concern. These issues are also briefly discussed in Appendix E ("Critical Elements of the Human Environment"). Item #7 and #9 were considered as warranting analysis as key issues.

G. <u>Issues to be Analyzed</u>

The following issues were considered by the ID Team as having sufficient concern to warrant more detailed analysis and will be addressed in section III, "Environmental Consequences".

- 1. Water quality / fish habitat
- 2. Special status animals species, particularly the northern spotted owl, northern goshawk and red tree vole.
- 3. Noxious weeds (because of the existence of a large infestation of scotch broom)
- 4. Recreational resources (effect of logging within the sight and sound of the North Umpqua Wild and Scenic river corridor)

II. ALTERNATIVES INCLUDING THE PROPOSED ACTION

This section describes the no action and proposed action alternative including any alternatives that were considered but eliminated from detailed study. As such these alternatives represent a range of reasonable potential actions. This section also discusses specific design features which would be implemented under the action alternatives. All action alternatives were designed to be in conformance with the ROD and PRMP.

A. The No Action Alternative

There would be no entry for the harvesting of timber within the bounds of the project area under this alternative. The existing environment would not change in the short term.

B. The Proposed Action Alternative

The proposed action would harvest approximately 3.9 MMBF (million board feet) of Mt. Scott RA's FY 1995 harvest commitment of 5.0 MMBF (771 hundred cubic feet (CCF)). Activities would occur in five harvest units of approximately 104 acres and road right-of-ways of one acre (private). Activities would include: road construction and renovation; final regeneration harvest with a combination of cable and helicopter logging; site preparation with fire through a combination of both machine and hand piling, and burning; and replanting with young seedlings.

Road construction would take place on approximately 2200' of public and 1200' of private lands for a total of 3400' or 0.6 miles. 1200' of road would be permanent and 2200' of road

would be temporary. Temporary roads would be natural (ie. soil) surfaced then ripped, blocked, planted and returned to the productive land base after the project has been completed. **Road renovation** would take place on approximately 6400' of public roads for a total of 1.2 miles.

Timber removal would utilize regeneration harvest techniques designed to open the forest canopy to allow the re-establishment of a new forest stand. The proposed action would require the skyline cable logging of units 13A, B, C and 15A and the helicopter logging of unit 13D plus some scattered isolated patches. A cleared helicopter landing area of one to two acres would be needed on private land.

Firewood cutting of logging debris (slash) would occur in landing cull decks and within 100' of roads.

Hand or machine piling of slash (ie. logging residue) would be done on all units except 13A followed by prescribed burning done in a manner consistent with the requirements of the Federal Clean Air Act. The Oregon Department of Environmental Quality is responsible for implementing the federal Clean Air Act, and the resulting Oregon Smoke Management Plan (OSMP) which requires the Oregon State Department of Forestry to manage the amount of smoke released into the airshed within the state. Firetrails would be constructed around the perimeters of the units to be burned.

C. Project Design Features As Part Of The Proposed Action

This section describes project design features (PDF's) which would be implemented in conjunction with the proposed action. PDF's are operating procedures, restrictions, requirements and structures included in the design of the project in order to minimize adverse environmental impacts. The PRMP contains a list of Best Management Practices (BMP's). The BMP's "... are defined as methods, measures or practices which are site specific to protect water quality or soil [productivity]". "...[BMP's] are selected during NEPA interdisciplinary process on a site specific basis to meet overall ecosystem management goals." (PRMP Appendix J). BMP's selected on a site specific basis become PDF's. The following PDF's are included with the proposed action:

1. To protect the riparian reserves:

a. The ROD (C-30) and PRMP (2-9) specify that riparian reserve widths be equal to the height of two site potential trees on each side of fish bearing streams and one site potential tree on each side of perennial or intermittent nonfish bearing streams. The Old Fairview Watershed Analysis has determined the height of a site potential tree to be 200'. Therefore, riparian reserve boundaries would average 200' slope distance from the edge of nonfish bearing streams and 400 feet from the edge of fish bearing streams.

b. All wetlands less than one acre would receive protection to the edge of the riparian vegetation. Four wet areas were noted in Unit 15A (see Appendix F - "IDT meeting minutes" 11/7/94). These areas would receive special protection by concentrating retention trees around these areas and not yarding through them.

c. Trees within one tree length of the riparian reserve would be directionally felled away from the riparian reserves to protect them from logging damage.

2. To minimize soil compaction, limit erosion, protect the duff layer and protect slope stability:

- a. Skyline logging would be required on all units and disturbance limited by partial suspension (i.e. use of a logging system that "suspends" the front end of the log during in haul to the landing and thereby lessening the "plowing" action that disturbs the soil).
- b. Slash in all units, except unit 13A, would be hand and/or machine piled. Machine piling would be done with an "excavator" type machine or a machine designed for low compaction during the summer season when soils are dry. Burning would be done under moist spring-like conditions in order to avoid hot burns that could damage or destroy the duff and organic layer; as well as limiting bare soil exposure due to burning. Unit 13A will not be burned.
- c. All temporary roads, would be ripped and planted after use and all cut banks and fill slopes would be mulched and seeded with native grass species (if available). No road construction or log hauling on unsurfaced roads would be permitted from Oct. 15 to May 15 or during periods of heavy precipitation unless conditions are such that no environmental damage would occur. These requirements would stabilize disturbed soil and minimize erosion and stream sedimentation.
- d. All firetrails would be water barred to limit erosion.

3. To protect wildlife:

- a. Future nesting and roosting habitat for cavity dwellers would be provided by reserving at least 1.2 hard or soft snags per acre in locations that do not conflict with safety to loggers. Where snags are deficient, extra green trees would be reserved for short term snag recruitment.
- b. Down woody debris (DWD) of 120 linear feet per acre and at least 16" diameter and 16' in length would be preserved for habitat for organisms that require this ecological niche (PRMP 2-19). Where DWD is lacking in the above quantities extra green trees would be reserved for future DWD recruitment.
- c. Wildlife habitat values would be maintained through the retention of six to eight (twelve to eighteen on Unit 15A) large (greater than 20") green conifer trees per acre and one hardwood per acre where available as a biological legacy and as a means of providing connectivity and dispersal habitat (PRMP 2-19).
- d. Slash piling and burning would be done in a manner to protect identified populations of red tree voles, retention trees and snags.

e. A Northern Goshawk nest is suspected to occur near or within the project area. Surveys will be conducted in the spring and early summer of 1995 to attempt to locate the actual nest site. If a location is established, a 30 acre buffer would be placed around the nest grove to protect the site from disturbance and seasonal restrictions within one quarter mile between March and August would apply (PRMP 2-35).

4. To protect air quality:

All slash burning would be conducted under the requirements of the Oregon Smoke Management Plan. (Note: unit 13A is a partial cut and would not be burned.)

5. To limit the spread of noxious weeds:

The use of weed free fill or surfacing material in road construction or renovation could limit the introduction and spread of noxious weeds. Spread can also be limited if road building and hauling is seasonally restricted to summer for unit 15D along with mowing the roadside scotch broom in early to mid summer prior to seed set and before construction or hauling begins. Otherwise, pressure washing of road building equipment and vehicles would be required before and after entering an infested area during the period of active seeding to minimize the spread of noxious weed seeds and propigules.

6. To prevent accidental spillage of petroleum products or other hazardous materials:

All hazardous materials would be stored in durable containers and located so that any accidental spill would not drain into riparian areas.

7. To preserve the visual aesthetics of the North Umpqua Wild and Scenic River Corridor:

All units would be layed out so as not to be visible to people travelling in the river corridor.

8. To protect a registered water user's water source:

The water diversion point (spring box) is located within the Riparian Reserve which would provide adequate protection to the water source and maintain water quality.

9. To protect an identified cultural site:

The site would be mitigated through avoidance (ie. the site will be tagged out of the unit).

D. Alternatives Considered but Eliminated from Further Analysis

1. The original Alternatives

This EA originally analyzed another proposed alternative that would have required the skyline cable logging of the entire sale including unit 13D. The only thing that prevented this from being a viable alternative was a lack of access rights across a private landowner. Obtaining this access could not have been accomplished within the time frame required for this project to be sold in fiscal year 1995, ie. before October 1, 1995 (See Appendix F "IDT Meeting")

Minutes" for Jan. 20, 1995). Therefore Specialist's Reports contained in Appendix F analyze three alternatives: no action, a cable logging alternative and a cable/helicopter combination alternative since this change took place late in the EA development.

As part of this original proposal a cost analysis was done on road/cable logging vs. helicopter logging of Unit 13D that showed that helicopter logging would cost \$207/MBF more than cable logging with the additional road construction (see Appendix F Specialist Report "Logging Cost Analysis" 12-5-94). This translates to an additional cost of approximately \$203,000 based on projected harvest estimates. An additional cost would also be borne in reforestation activities (tree planting primarily) due to lack of access which would be reflected in a higher bid price on reforestation contracts. The Silviculturalist estimates that this could be an additional \$150 - 200/ac or approximately \$6000 additional. Some treatments such as tubing and mulching would probably be foregone due to expense.

2. Helicopter Alternative

An alternative to helicopter log the entire sale was considered but eliminated from further analysis because existing roads are already in place for cable logging and no overriding environmental issues necessitated the use of a helicopter option for these units; therefore this option was dropped because of economic considerations (See Appendix F "Logging Cost Analysis" 12-5-94).

III. ENVIRONMENTAL CONSEQUENCES

This section forms the scientific and analytical basis for the comparisons of the alternatives. This section describes probable consequences (impacts or effects) on resources or issues identified in section I paragraph F by alternatives. Appendix F (Background Reports) contains Specialist's Reports that provides greater details of the environmental consequences from the perspective of that specialty.

A. No Action Alternative

This alternative assumes that the lands within the analysis area would continue to function according to natural processes (ie. normal forest succession, wildfire events and other natural disturbances). This alternative, in effect, describes the existing environment, ie. the "affected environment" and provides the baseline for analyzing the action alternatives. This section addresses the anticipated consequences of the "no action" alternative. Chapter 3 of the PRMP describes the physical and biological characteristics of BLM lands as they now exist on the Roseburg District. A description of the existing environment is also described in the "Watershed Analysis" for the Old Fairview watershed.

Issue #1 - Water Quality / Fisheries:

The proposed project is located in the North Umpqua River watershed, but the units occur in smaller, physically isolated sub-basins (Cole Creek and Hogback Creek). Cole Creek (section 13) is a non-fish bearing stream. This creek is blocked to anadromous fish by a gradient barrier

at the mouth of the stream. Hogback Creek (section 15) supports a small population of Coastal Cutthroat trout, which are currently proposed by the National Marine Fisheries Service to be listed as an endangered species in the Umpqua basin. This stream is also isolated from the North Umpqua River by a gradient barrier at the mouth. This creates a potentially unique population due to the small basin size and the inability of the population to interact genetically with the larger North Umpqua cutthroat population. The stream becomes non-fish bearing near the fork just north of the power line. The streams in the proposed unit do not support fish. Under this alternative fisheries and water quality values would not change except as the result of natural variability and current conditions.

Issue #2 - Special Status Animal Species:

Wildlife Habitat - The Cole and Hogback Creek compartments currently contain a variety of seral stages, from recent harvest units to old growth Douglas fir. Considering the watershed as a whole, private ownership as well as federal, two seral stages are represented in relatively larger proportions than others, closed sapling (26-75 yrs, 32%) and saw-timber (25%). These two age classes comprise 57% of the entire watershed. Two age classes are underrepresented in the watershed, grass/forb (0-5 yrs, 8%) and young old growth (121-195 yrs, 5.2%). Older interior forest habitat is present in several relatively contiguous blocks of several hundred acres. It is composed of remnant old growth patches that have survived previous fires in a matrix of saw-timber and some young old growth. The Watershed Analysis for the Old Fairview LAU gives details on acreage and distribution of these stands. The net result of expected private harvesting combined with no federal harvesting in this watershed would result in a shift from the current large proportions of closed-sapling and saw-timber and small proportions of grass-forb and young old-growth to nearly equal proportions of all seven age classes in this watershed. The long term effect of no action (ie. no harvest and the continuation of natural processes) would be to maintain the current size and function of the large interior older forest block within the project area.

Northern Spotted Owls are located within 1.2 miles of the proposed harvest units. Both sections in which sale units are located are designated as Critical Habitat for the northern spotted owl. They are part of a larger Critical Habitat Unit, CHU OR-27. Habitat conditions in OR-27 range from fairly large, contiguous blocks of old growth with associated structural and down wood components to fragmented patches of older forest embedded in a matrix of younger stands. Many of these smaller patches have been found to be low in down wood and snag components as a result of previous management and fire history. In a no action alternative, there would be a "no effect" situation with respect to owls and critical habitat.

A **Northern Goshawk** pair was located in the project area during field surveys in 1994 and may be affected by any actions occurring within its home range. All units in this proposed project fall within the estimated home range of this pair and provide at least foraging habitat. In order to maintain a well-distributed population of this species in the Northwest, the protection of this, the only currently documented active nesting pair in the Roseburg District and on the

southern limits of its range, is important. Selection of a no action alternative would result in retention of this habitat and freedom from disturbance which should provide the necessary requirements for continued occupation and successful reproduction by this pair.

Current distribution of the **Red Tree Vole** in this watershed is unknown. Habitat is considered to be late successional forest habitat (35% of the watershed - Old Fairview Watershed Analysis). Nesting and foraging habitat would remain the same under a no action alternative.

Issue #3 - Noxious Weeds:

Noxious weeds, in this case, Scotch Broom (Cystisus scoparius) occurs throughout the Old Fairview Watershed. It is mostly concentrated along existing roads, trails and rock stockpiles. It has been estimated that Scotch Broom is spreading at the rate of approximately 1000 acres per year (1994 Noxious Weeds EA). Under the "No Action" alternative no new populations would be introduced as a result of logging activity and further spread would continue from existing populations along roads and trails spreading by dissemination from vehicular traffic and natural spread.

Issue #4 Recreational Resources:

All the proposed units lie outside the North Umpqua Wild and Scenic (W&S) River Corridor. Unit 15A is located a quarter of a mile away and is classified VRM-4 (allows major modifications of existing character of landscapes). Portions of Units 13D and 13C are in the VRM-2 classification (retain existing character of the landscape) while the remaining portions of these units are VRM-3 (partially retain existing character of the landscape). The southwest corner of Unit 13D corners on the W&S boundary.

B. Proposed Action

This paragraph describes the anticipated consequences of the proposed action beyond those that are mitigated by PDF's (see Section II, para. C).

Issue #1 - Water Quality / Fisheries:

Cable logging impacts

An important affect of timber harvest is opening up the canopy (especially in the transient snow zone). Water quality is impacted when the forest canopy is removed. As young forest stands grow these impacts are lessened. Stands are considered "hydrologically recovered" when a closed forest canopy is reestablished. Recovery is expected to occur when the stands reach approximately 30 years of age. When hydrologic recovery occurs the canopy provides interception of precipitation and a thermal buffer to the forest floor. In the Old Fairview Watershed Analysis a desired future condition was to maintain stands below 30 years of age in any compartment at less than 30%. Cole Creek currently has 9% of its 1260 acres in stands below 30 years of age. The additional 72 acres from regeneration harvest would change this figure to 14%. There are currently 247 acres of timber in this compartment that are harvestable

(ie. older than 40 years) on private lands. If all the private lands were harvested, 420 acres would be less than 30 years of age or 33% of this compartment see Old Fairview Watershed Analysis).

There are no fisheries concerns in **Section 13**.

In **Section 15** no increases in water temperature are anticipated because the shade over the stream is being maintained and there will be no riparian reserve encroachment by roads. No significant sedimentation is anticipated because the logging operations will be seasonally restricted, the new road will be put to bed after logging of the unit is complete, and a riparian reserve will be maintained. No increases in peak flows are anticipated due to the relatively small area of the watershed that will be less than 30 years of age, and due to the fact that very little of the watershed is in the transient snow zone.

The proposed harvest unit in section 15 is approximately 32 acres. The unit is in the Hogback compartment which currently has 1397 acres (91%) in hydrologic recovery (stands > 30 years of age). Harvest of the proposed unit would change the recovered acreage to 1365 acres (89%). The proposed unit would not have as great an impact on hydrology since harvesting would leave approximately 18 trees per acre. These trees would be clumped and scattered throughout the unit so that some areas would maintain their current canopy while in other areas canopy closure would be reduced. Overall hydrologic recovery of the proposed unit should occur in a shorter time period.

Within the Hogback compartment, there are approximately 885 acres of private stands that are older than 26 years (see Old Fairview, figure V.T1). Any or all of these stands could be harvested within the next 30 years depending on the objectives of the private landowner. Oregon Forest Practices Act would govern how these lands would be harvested. If all the private lands were harvested in a short period of time, it would change the hydrology. The impacts on streams of harvesting private lands would be diffused in Hogback since the compartment consists of a series of several small streams that flow into the North Umpqua river rather than one main stream. Industrial landowners have indicated they will harvest on a 40 to 60 year rotation. Beyond this it is very speculative at best to determine how the private lands would be harvested.

Helicopter logging impacts

No new road construction would be required to access unit 13D, therefore no increased sedimentation is anticipated. Also, there would be no increased chance of road failures with the resulting sedimentation to streams. The streams would maintain their current level of shade and the riparian reserves will continue to function at an increasing level over time.

Issue #2 - Special Status Animal Species:

Habitat - The major effects to special status species resulting from this proposal have to do with habitat loss from harvest of standing live trees in the units. Harvest of units 13C and D would increase the fragmentation of the older forest habitat.

The entire sale would remove a total of 106 acres of suitable **Northern Spotted Owl** habitat, reducing the amount within the home range of the Smith Springs owl from 36% to 35%, and reducing the amount within the home range of the Susan Creek owl from 42% to 38%. This would result in a "may effect" and be a "take" situation for both owl sites. This level of impact is not considered to result in adverse modification of Critical Habitat Unit OR-27.

Regeneration harvest and partial cut harvest of these units would remove documented foraging habitat used by the known nesting pair of **goshawks** in the area. Several sightings have been made of adult birds in unit 13B as well as avian prey remains on plucking perches. It is unknown whether this pair uses this stand or other stands within the proposed project area for foraging only, or whether the actual nest site may be located in it as well. Visual surveys conducted in late summer of 1994 did not locate any nest structures in any of the proposed units. The current condition of these units indicates that they could provide nesting habitat. Harvest of the proposed units would reduce the effective nesting and foraging habitat available and may result in the loss of an active nest site. If a nest tree is found, the project would have to be reconfigured to accommodate a 30 acre nest grove buffer.

Impacts to the population of the **Red Tree Vole** are unknown because the distribution and density of the species are currently unknown. It is expected that some mortality may occur as a result of harvest of this sale, however the effects that this will have on population levels in the region and connectivity between regions cannot be calculated until further inventories are conducted.

Issue #3 - Noxious Weeds:

Construction of new roads and renovation of existing roads could result in the introduction and spread of noxious weeds from the movement of contaminated equipment and vehicles into and out of the area and the use of weed contaminated fill or surfacing material. The removal of the timber overstory and the scarification of the soils from logging would provide conditions favorable for the establishment of weed species. The ROD\PRMP states that no non-native (noxious weeds) will be introduced into an area (PRMP 2-60). The proposed action alternative with the construction and renovation of roads could introduce and cause the spread of noxious weeds.

Issue #4 Recreational Resources:

Once the units are harvested persons driving the back country by-ways on the logging roads would be aware of recent logging activity for the next decade or two. The harvest units would not be visible from major vantage points within the North Umpqua W&S River Corridor, so there would be no impacts to casual observers on the river or highway. During active logging, noise (helicopter and/or yarder tooting) would likely be audible from the river corridor and Susan Creek Campground and the helicopter could be viewed at times but this would be a short term, temporary disturbance during periods of operation. Some campers and by-ways travelers could find the noise and sight offensive while others could view this as an interesting sidelight to their trip.

IV. CONTACTS, CONSULTATIONS, AND PREPARERS

A. Agencies, Organizations, and Persons Consulted

An extensive list of special interest groups, timber companies, water users and adjacent landowners near the proposed project area were contacted by mail to ask for their concerns and issues regarding this proposed project. A copy of the letter sent to these groups and the mailing list used for notification are contained in Appendix G.

The Lone Rock Timber Co. commented in favor of the proposed plan. The Oregon Natural Resources Council expressed interest in the project as it develops. Mark Powell, a representative for the Little River Committee, had some constructive comments that have been incorporated into this EA, specifically his comments about impacts by possible harvest on private lands. Several adjacent landowners called with questions which were answered. Robert Kummel, a domestic water user and adjacent landowner expressed some concerns that are addressed in Section II para. C-8 and Appendix E.

Letters were also sent to the following Native American Indian Tribes to solicit their concerns: Confederated Tribes of Siletz Indians, Confederated Tribes of Grand Ronde and the Cow Creek Band of the Umpqua Tribe of Indians. No comments were received.

B. Future Public Notification

A 30-day public comment period will be established for review of this EA and the associated FONSI. A notice of availability will be published in the Roseburg News Review. This EA and its associated documents would be sent to all parties who request them. If the decision is made to implement this project, a notice would be published in the Roseburg News Review.

C. <u>List of Preparers</u>

Dan Couch ID Team Leader / EA Coordinator/Specialist

Isaac Barner Cultural Resources
Ron Wickline Botany / Silviculture
Ralph Klein Soils/Hydrology

Elijah Waters Fisheries

Jim Luse Timber / Presale Forester / EA Preparer

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Nancy Duncan Wildlife

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Fred Larew Mining Claims / Land Resources